

STEPHANIE M. HINDS (CABN 154284)  
United States Attorney

**FILED**

May 26 2022

Mark B. Busby  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. CR22-210SI
	)	
Plaintiff,	)	
	)	Violations:
v.	)	18 U.S.C. § 2252(a)(4)(B) and (b)(2) – Possession of
	)	Child Pornography
CHRISTOPHER JAMES WAGNER,	)	18 U.S.C. § 2253(a) – Criminal Forfeiture
	)	
Defendant.	)	
	)	SAN FRANCISCO
	)	
	)	

I N F O R M A T I O N

The United States Attorney charges:

COUNT ONE: (18 U.S.C. § 2252(a)(4)(B) and (b)(2) – Possession of Child Pornography)

Beginning on or about May 29, 2021, and continuing through on or about June 26, 2021, in the Northern District of California, the defendant,

CHRISTOPHER JAMES WAGNER,  
did knowingly possess matter which contained at least one visual depiction that had been shipped and transported using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and which was produced using any materials which have been mailed, shipped, and transported using any means and facility of interstate and foreign commerce, including by computer, the production of which visual depiction involved the use of a prepubescent minor and a minor who had

not attained 12 years of age engaging in sexually explicit conduct, which visual depiction was of such conduct, all in violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2).

**FORFEITURE ALLEGATION:** (18 U.S.C. § 2253(a) – Criminal Forfeiture)

The allegations contained in this Information are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

Pursuant to Title 18, United States Code, Section 2253, upon conviction of the offense set forth in this Information, the defendant,

CHRISTOPHER JAMES WAGNER,

shall forfeit to the United States of America:

- a. Any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense alleged above; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense alleged above including the following specific property;
  - 1) Dell Precision 5820;
  - 2) Juniper Networks SRX240 ethernet port;
  - 3) Netgear GS 110 MX unmanaged switch ethernet port;
  - 4) SK Hynix 256GB Hard Drive; and
  - 5) Synology Disk Station Network Attached Storage.

If any of the property described above, as a result of any act or omission of the defendant:

- a. Cannot be located upon exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the court;

1 d. Has been substantially diminished in value; or

2 e. Has been commingled with other property which cannot be divided without difficulty,  
3 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,  
4 United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b)  
5 and Title 28, United States Code, Section 2461(c).

6 All pursuant to Title 18, United States Code, Section 2253, Title 28, United States Code, Section  
7 2461(c), and Federal Rule of Criminal Procedure 32.2.

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10  
11 DATED: May 26, 2022\_

STEPHANIE M. HINDS  
United States Attorney

13 /s/ Christa Hall  
14 CHRISTA HALL  
Assistant United States Attorney